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February 19, 2019  
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

**RE: Network USA, LLC**  
**EB Docket No. 06-36; CPNI Certification CY 2018**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Network USA, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwightman@inteserra.com](mailto:cwightman@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Connie Wightman

Connie Wightman  
Consultant

tms: FCx1902

Enclosures  
CW/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification :	Covering calendar year 2018
Name of company(s) covered by this certification:	Network USA, LLC
Form 499 Filer ID:	824264
Name of signatory:	Shane Turley
Title of signatory:	SVP & General Counsel

1. I, Shane Turley, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
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Shane Turley  
SVP & General Counsel

Date: 2/8/2019  
\_\_\_\_\_

**Attachments:**      Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (not applicable, see Statement)  
Summary of customer complaints (not applicable, See Statement)

## **STATEMENT OF CPNI PROCEDURES AND COMPLIANCE NETWORK USA, LLC**

### **USE OF CPNI**

Network USA, LLC ("Network USA") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Network USA has trained its personnel not to use CPNI for marketing purposes. Should Network USA elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Network USA does have CPNI, including quantity, technical configuration, type, location and use of telecommunications services provided by the Company. However, this information is only made available to customers in person pursuant to procedures described below.

### **PROTECTION OF CPNI**

As set forth below, Network USA has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Requests for information must be sent in writing by the authorized party of record for the customer. Network USA responds back in writing, to the authorized customer representative at the primary address of record. The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to insure that procedures are being followed.

### **DISCLOSURE OF CALL DETAIL OVER PHONE**

Network USA has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Network USA's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. The company authenticates customers by requiring the customer to establish a password for this purpose. Customers are required to establish a password without the use of readily available biographical information or account information if they want to receive call detail over the telephone. If the appropriate password is not provided, Network USA does not disclose call detail over the telephone. Network USA does not offer a back-up authentication method, but does allow a customer to reset a lost password. Instructions for resetting the password are provided via mail or email to the address established by the customer of record.

In some instances involving a business customer with a dedicated account representative, the Company has agreements that address authentication procedures for disclosing CPNI that may differ from those described above.

The Company has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. The Customer of Record is notified by email that the account information has been updated or changed and is given instructions to notify the company's customer service number if the customer believes the account may have been updated or changed in error.

## **DISCLOSURE OF CPNI ONLINE**

Network USA does not disclose CPNI online at this time. Should it choose to do so in the future, it will institute authentication procedures to safeguard the disclosure of CPNI online.

## **DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

Network USA does not have any retail locations and therefore does not disclose CPNI in-store.

## **NOTIFICATION TO LAW ENFORCEMENT**

Network USA has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Network USA maintains written records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

## **ACTIONS AGAINST DATA BROKERS**

Network USA has not taken any actions against data brokers in the last year.

## **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

Network USA did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2018.

## **INFORMATION ABOUT PRETEXTERS**

Network USA has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI by adhering to the guidelines described herein for access to CPNI. Network USA is committed to notify the FCC of any new or novel methods of pretexting that it encounters and of any actions Network USA takes against pretexters and data brokers.